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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. CR 12-0834
14 Plaintiff,)	
15 v.)	STIPULATION AND [PROPOSED] ORDER TO
16 JUAN PARTIDA,)	CONTINUE STATUS CONFERENCE FROM MAY
17 Defendant.)	4, 2016 TO MAY 11, 2016
18 _____)	

19 This matter is currently set for a status conference before the Court on May 4, 2011. The parties
20 have been negotiating a resolution and are close to finalizing an agreement. A resolution in this case
21 would moot the pending motions and bring finality to the case. The parties seek an additional week to
22 finalize and present the agreement to the Court. Accordingly, the parties jointly request to continue the
23 status conference to May 11, 2016 at 1:00 p.m. Moreover, the parties stipulate that time be excluded
24 under the Speedy Trial Act between May 4, 2016, and May 11, 2016, because motions are pending
25 before the Court, defense counsel needs the time to review discovery and to conduct necessary

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28 STIPULATION AND [PROPOSED] ORDER
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investigation, and for continuity of counsel.

DATED: April 29, 2016

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

/s/
MARC PRICE WOLF
Assistant United States Attorney

/s/
STEVEN GRUEL
Attorney for Defendant

[PROPOSED] ORDER

The status conference currently scheduled for May 4, 2016, is continued to May 11, 2016, at 10:00 a.m. ~~1:00 p.m.~~ Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between May 4, 2016, and May 11, 2016, would unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). Moreover, motions are currently pending before the Court. 18 U.S.C. § 3161(h)(1)(D). The Court further finds that the ends of justice served by excluding the time between May 4, 2016, and May 11, 2016, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between May 4, 2016, and May 11, 2016, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv), and (h)(1)(D).

IT IS SO ORDERED.

DATED: 4/29/2016

